

Mr. Frank Hezoucky
Hendrickson Trailer Suspension System
2070 Industrial Place S. E.
Carlton, OH 44707-2600

Re: 011-15269
First Minor Permit Modification to
Part 70 No.: T 011-11925-00037

Dear Mr. Hezoucky:

Hendrickson Trailer Suspension System was issued Part 70 operating permit T 011-11925-00037 on October 2, 2000 for the operation of paint booths for trailer parts. An application to add a new emission unit was received on November 28, 2001. The requested modifications were addressed in the Minor Source Modification No. 011-15223-00037. Pursuant to the provisions of 326 IAC 2-7-12, a minor permit modification to the Part 70 permit is hereby approved to incorporate the new emission unit and the applicable conditions, as described in the attached Technical Support Document.

The modification consists of the addition of one (1) touch-up paint booth downstream of the existing paint booth (EP-2).

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

mm

cc: File - Boone County
Boone County Health Department
Air Compliance Section Inspector - Marc Goldman
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Hendrickson Trailer Suspension Systems
180 Mount Zion Road
Lebanon, IN 46052**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T011-11925-00037	Date Issued: October 2, 2000
--	------------------------------

First Administrative Amendment No.: 011-13885-00037

Date Issued: March 22, 2001

First Minor Permit Modification: 011-15269-00037	Affected Pages: 4, 5, 34a, 34b
Issued by: Paul Dubenetzky, Chief Air Permits	Issuance Date:

D.2 FACILITY OPERATION CONDITIONS - Insignificant Activities - Grinding and Welding . . 32

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Compliance Determination Requirements

D.2.2 Particulate Matter (PM)

D.3 FACILITY OPERATION CONDITIONS - Insignificant Activities - Degreasing

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Organic Solvent Degreasing Operations: Cold Cleaner Degreaser Operation and Control
[326 IAC 8-3-5]

D.4 FACILITY OPERATION CONDITIONS - Touch-Up Paint Spray Booth34a

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9] and HAPS Major Sources: New
Source Toxics Control [326 IAC 2-4.1-1]

D.4.2 Particulate Matter (PM) [326 IAC 6-3-2]

D.4.3 Major Sources of Hazardous Air Pollutants [326 IAC 2-4.1]

D.4.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.4.5 Volatile Organic Compounds (VOC)

D.4.6 VOC Emissions

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.7 Particulate Matter (PM)

D.4.8 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.9 Record Keeping Requirements

Certification

Emergency/Deviation Occurrence Report

Quarterly Compliance Monitoring Report

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary metal finishing plant for trailer suspension systems.

Responsible Official:	Joseph M. Ross
Source Address:	180 Mount Zion Road, Lebanon, IN 46052
Mailing Address:	180 Mount Zion Road, Lebanon, IN 46052
Phone Number:	765-483-5362
SIC Code:	3714
County Location:	Boone County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) paint spray booth, identified as EP-2, with a maximum production rate of 21.47 trailer parts per hour, using a dry filter as control, exhausting at Stack 1, identified as S-1.
- (b) One (1) paint spray booth, identified as EP-9, with a maximum production rate of 16.91 trailer parts per hour, using a dry filter as control, exhausting at Stack 2, identified as S-2.
- (c) One (1) touch-up paint booth, with a maximum production rate of 21.47 trailer parts per hour, using dry filter as control, exhausting at stack # 3.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Grinding and machining operation controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following; deburning, buffing, polishing, abrasive blasting, pneumatic conveying and woodworking operations. (Two belt grinders, identified as EP-4, each connected to a cyclone separator and a baghouse)

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: One (1) touch-up paint spray booth

One (1) touch-up paint spray booth, with a maximum production rate of 21.47 trailer parts per hour, using a dry filter as control, exhausting at Stack 3, identified as S-3.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the touch-up paint spray booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water for extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.4.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the surface coating shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.4.3 Major Sources of Hazardous Air Pollutants [326 IAC 2-4.1]

Any change or modification which would increase the potential to emit for the paint booth of a single hazardous air pollutant (HAP) to ten (10) tons per year or more or a combination of HAPs to twenty-five (25) tons per year or more shall obtain prior approval from IDEM, OAQ and may be subject to the requirements of 326 IAC 2-4.1.

D.4.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.4.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.4.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.4.6 VOC Emissions

Compliance with Condition D.4.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Hendrickson Trailer Suspension System
Lebanon, Indiana
Permit Reviewer: Mike Swinney

First Minor Permit Modification 011-15269-00037
Modified By: Madhurima D. Moulik

Page 34b of 38
T 011-11925-00037

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.7 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2, the dry filter for PM control shall be in operation at all times when the touch-up paint booth is in operation.

D.4.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filter. To monitor the performance of the dry filter, weekly observations shall be made of the overspray from the surface coating booth stack S-3 while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.9 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC limits established in Condition D.4.1 and that the HAP PTEs are below the levels noted in Condition D.4.3.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The cleanup solvent usage for each month;
 - (3) The total VOC usage for each month;
 - (4) The total single HAP usage for each month; and
 - (5) The total HAP usage for each month.
- (b) To document compliance with Condition D.4.8 the Permittee shall maintain a log of weekly

overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Minor Permit Modification

Source Background and Description

Source Name:	Hendrickson Trailer Suspension Systems
Source Location:	180 Mount Zion Road, Lebanon, IN 46052
County:	Boone
SIC Code:	3714
Operation Permit No.:	T011-11925-00037
Minor Source Modification No.:	011-15269-00037
Permit Reviewer:	Madhurima D. Moulik

The Office of Air Quality (OAQ) has reviewed a modification application from Hendrickson Trailer Suspension Systems relating to the operation of following emission units and pollution control devices permitted in the Minor Source Modification 011-15223:

- (a) One (1) touch-up paint booth, with a maximum production rate of 21.47 trailer parts per hour, using dry filter as control, exhausting at stack # 3.

Recommendation

The staff recommends to the Commissioner that the Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 11, 2001.

Emission Calculations

- (a) The emissions from the touch-up paint booth was determined in the Minor Source Modification 011-15223. This permit modification will not result in any change in the emissions.

State Rule Applicability

This permit modification will not result in any change to the state rule applicability already determined. See determination made in the Minor Source Modification 011-15223.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal

rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source stays the same as in the Minor Source Modification No.: 011-15223.

Changes to the Part 70 Permit:

The following are the changes to the Part 70 Permit 011-11925-00037 (~~strikeout~~ to show deletions and **bold** to show additions):

1) The new Section D.4 is added to the Table of Contents:

D.3 FACILITY OPERATION CONDITIONS - Insignificant Activities - Degreasing

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Organic Solvent Degreasing Operations: Cold Cleaner Degreaser Operation and Control
[326 IAC 8-3-5]

D.4 FACILITY OPERATION CONDITIONS - Touch-Up Paint Spray Booth34a

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9] and HAPS Major Sources: New Source Toxics Control [326 IAC 2-4.1-1]

D.4.2 Particulate Matter (PM) [326 IAC 6-3-2]

D.4.3 Major Sources of Hazardous Air Pollutants [326 IAC 2-4.1]

D.4.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.4.5 Volatile Organic Compounds (VOC)

D.4.6 VOC Emissions

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.7 Particulate Matter (PM)

D.4.8 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.9 Record Keeping Requirements

2) The Section A.2 is modified as follows:

**A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]**

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) paint spray booth, identified as EP-2, with a maximum production rate of 21.47 trailer parts per hour, using a dry filter as control, exhausting at Stack 1, identified as S-1.

(b) One (1) paint spray booth, identified as EP-9, with a maximum production rate of 16.91 trailer parts per hour, using a dry filter as control, exhausting at Stack 2, identified as S-2.

3. One (1) touch-up paint booth, with a maximum production rate of 21.47 trailer parts per hour, using dry filter as control, exhausting at stack # 3.

3) The Section D.4 is added for the touch-up paint booth:

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: One (1) touch-up paint spray booth

One (1) touch-up paint spray booth, with a maximum production rate of 21.47 trailer parts per hour, using a dry filter as control, exhausting at Stack 3, identified as S-3.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the touch-up paint spray booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water for extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.4.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the surface coating shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

D.4.3 Major Sources of Hazardous Air Pollutants [326 IAC 2-4.1]

Any change or modification which would increase the potential to emit for the paint booth of a single hazardous air pollutant (HAP) to ten (10) tons per year or more or a combination of HAPs to twenty-five (25) tons per year or more shall obtain prior approval from IDEM, OAQ and may be subject to the requirements of 326 IAC 2-4.1.

D.4.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.4.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.4.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.4.6 VOC Emissions

Compliance with Condition D.4.1 shall be demonstrated within 30 days of the end of each

month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.7 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2, the dry filter for PM control shall be in operation at all times when the touch-up paint booth is in operation.

D.4.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filter. To monitor the performance of the dry filter, weekly observations shall be made of the overspray from the surface coating booth stack S-3 while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.9 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC limits established in Condition D.4.1 and that the HAP PTEs are below the levels noted in Condition D.4.3.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The cleanup solvent usage for each month;
 - (3) The total VOC usage for each month;
 - (4) The total single HAP usage for each month; and
 - (5) The total HAP usage for each month.
- (b) To document compliance with Condition D.4.8 the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record

Keeping Requirements, of this permit.

